

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/HB)

JOINT UPDATE LETTER

This Document Relates To:

All Actions

Dear Judge Bowbeer:

Pursuant to the proposed order submitted at ECF No. 615 and Joint Update Letter submitted at ECF 650, Plaintiffs and Defendant Smithfield Inc., (“Smithfield”) hereby provide the following joint update regarding the status of their ongoing negotiations regarding document search methodology and search terms.

The Parties have met and conferred over the course of several weeks regarding the search terms that will be used by Smithfield and have reached agreement. Due to the volume of documents involved, it is likely that Smithfield will use some form of technology-assisted review (“TAR”) during the discovery process, and Smithfield will provide Plaintiffs with information about its use of TAR as the document review progresses. While there are no disputes at this time, the Parties will update the Court if any issue requiring the Court’s intervention arises.

Dated: February 5, 2021

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